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*Counsel for Citibank N.A., as Administrative Agent
for the Utility Revolving Credit Facility*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF CROSS-MOTION OF
ADMINISTRATIVE AGENT FOR LEAVE
TO APPEAL ORDER REGARDING
POSTPETITION INTEREST**

Date: TBD

Time: TBD

Judge: TBD

Objection Deadline: March 12, 2020

1 **PLEASE TAKE NOTICE** that on January 29, 2019, PG&E Corporation and Pacific Gas
2 and Electric Company, as debtors and debtors in possession (collective, the “**Debtors**”), in the
3 above-captioned chapter 11 cases, each filed a voluntary petition for relief under chapter 11 of title
4 11 of the United States Code with the United States Bankruptcy Court for the Northern District of
5 California (San Francisco Division) (the “**Bankruptcy Court**”).

6
7 **PLEASE TAKE FURTHER NOTICE** that, pursuant to 28 U.S.C. § 158(a)(3) and
8 Federal Rule of Bankruptcy Procedure 8004, Citibank, N.A., as administrative agent (in such
9 capacity, the “**Administrative Agent**”) under that certain Second Amended and Restated Credit
10 Agreement dated as of April 27, 2015 (as amended, supplemented or otherwise modified) (the
11 credit facility governed thereby, the “**Utility Revolving Credit Facility**”) among Pacific Gas and
12 Electric Company and several lenders from time to time party thereto, filed the *Cross-Motion of*
13 *Administrative Agent for Leave to Appeal Order Regarding Postpetition Interest* (the “**Cross-**
14 **Motion**”). The Cross-Motion accompanies the Administrative Agent’s *Notice of Appeal and*
15 *Statement of Election to Have Appeal Heard by District Court* (the “**Notice of Appeal**”), this notice
16 of the Cross-Motion, and all the papers and record on file in this action.

17
18 **PLEASE TAKE FURTHER NOTICE** that the Cross-Motion may be heard by the United
19 States District Court of the Northern District of California (the “**District Court**”) at a date and
20 time to be set by the District Court. Pursuant to Federal Rule of Bankruptcy Procedure 8004(c)(3),
21 however, any relief requested in the Cross-Motion may be granted without a hearing.

22
23 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Federal Bankruptcy Rule of
24 Procedure 8004(b)(2) and 8013, any oppositions or responses to the Cross-Motion must be in
25 writing, filed with the District Court, and served on counsel for the Administrative Agent so as to
26 be received by no later than **March 12, 2020**. Any oppositions or responses must also be filed and
27 served on all the parties reflected in the Notice of Appeal.
28

PLEASE TAKE FURTHER NOTICE that copies of the Cross-Motion and its supporting papers can be viewed and/or obtained: (i) by accessing the Bankruptcy Court's website at <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for international parties or by email at: pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the Bankruptcy Court's website.

DATED: March 5, 2020

DAVIS POLK & WARDWELL LLP

/s/ Timothy Graulich

TIMOTHY GRAULICH

MARC J. TOBAK (*pro hac vice* application forthcoming)

DAVID SCHIFF

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